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6 Attorneys for Plaintiff
7 UNUM LIFE INSURANCE COMPANY
OF AMERICA

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

UNUM LIFE INSURANCE COMPANY OF AMERICA

13 Plaintiff,

Case No. 2:24-cv-00026-SVW-PD

STIPULATION FOR JUDGMENT

Complaint Filed: January 2, 2024
Judge: Hon. Stephen V. Wilson

ELIJAH MAHARAJ; and BISSUN PRASAD and ALLEN BOAZ in their capacities as Administrators of the Estate of PRANEEL PRASAD,

Defendant.

1 IT IS HEREBY STIPULATED by and between Plaintiff, Unum Life
2 Insurance Company of America (“Unum”) and Defendants Bissun Prasad and
3 Allen Boaz in their capacities as Administrators of the Estate of Praneel Prasad
4 (collectively, “Defendants”), that judgment shall be entered in favor of
5 Defendants, jointly and severally, as follows:

6 A. Unum shall pay the Defendants \$407,438.76, which represents the
7 death benefits due under the Group Policy (\$418,000.00), minus attorney’s fees
8 (\$10,000.00) and costs (\$561.24); and

9 B. Unum may retain \$10,561.24 of the death benefits in order to recover
10 its reasonable attorney’s fees and costs which it incurred due the necessity of:
11 amending the complaint to name Defendants in their administrative capacities for
12 the Estate of Praneel Prasad (the “Estate”); obtain an Ex Parte Application for
13 Alternative Service to serve Elijah Maharaj at the Los Padrinos Juvenile Hall;
14 prepare a motion for entry of default; and attend multiple hearings to advise this
15 Court as to the status of the Estate; and

16 C. Defendants are permanently enjoined from prosecuting any action or
17 proceeding in any State or United States court against Unum, for the recovery of
18 the death benefits, or any portion thereof; and

19 D. Unum shall have no further liability beyond \$407,438.76 and without
20 further Order of this Court, Unum shall be dismissed with prejudice from this case.

21 **IT IS SO STIPULATED.**

22
23 DATED: October 21, 2024

24 OGLETREE, DEAKINS, NASH, SMOAK
25 & STEWART, P.C.

26 By: /s/ Sean P. Nalty

27 Sean P. Nalty

28 Attorney for Plaintiff

Unum Life Insurance Company of
America

1
2 DATED: October 21, 2024 CANNON LEGAL FIRM
3

4 By: /s/ Dana M. Cannon
5 Dana M. Cannon
6 Attorney for Defendants
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ATTESTATION

8 Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), I attest under penalty of perjury that
9 all other signatories to this filing concur in the filing's content and have authorized
10 the filing.

11 DATED: October 21, 2024 OGLETREE, DEAKINS, NASH,
12 SMOAK & STEWART, P.C.

13
14 By: /s/ Sean P. Nalty
15 Sean P. Nalty
16 Attorneys for Defendant
17 Unum Life Insurance Company of
18 America
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